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**UNITED STATE DISTRICT COURT  
DISTRICT OF NEW JERSEY**

DAVID LORENZO

*Plaintiff,*

v.

THE BOROUGH OF PALISADES  
PARK, NEW JERSEY; CHONG PAUL  
KIM (individually and in his official  
capacity as Mayor of the Borough of  
Palisades Park, New Jersey); and SUK  
“JOHN” MIN (individually and in his  
official capacity as a member of the  
Borough Council of Palisades Park, New  
Jersey

*Defendants.*

Hon. Claire C. Cecchi, U.S.D.J.

Hon. José R. Almonte, U.S.M.J.

Civ. No.: 2:23-CV-21849-CCC-JRA

CIVIL ACTION

**NOTICE OF OPPOSED MOTION  
TO AMEND PLAINTIFF’S  
COMPLAINT**

**PLEASE TAKE NOTICE** that on April 15, 2024 or as soon thereafter as counsel may be heard, plaintiff David Lorenzo, by way of Motion will apply move before the above-named court for leave to file an Amended Complaint pursuant to *Fed. R. Civ. P.* 15 and *L. Civ. R.* 15.1, and for entry of an Order for leave to file a first amended complaint.

**PLEASE TAKE FURTHER NOTICE** that in support of this motion, Plaintiffs shall rely upon the enclosed brief and declaration of Leonard E. Seaman submitted herewith;

**PLEASE TAKE FURTHER NOTICE** that a proposed form of Order is also submitted herewith;

**PLEASE TAKE FURTHER NOTICE** that pursuant to *L. Civ. R. 78.1(b)*, oral argument is not requested.

s/ Leonard E. Seaman  
RICHARD MALAGIERE  
LEONARD E. SEAMAN  
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Dated: March 21, 2024